

B2  
--20. (New) The method according to claim 19, wherein an access is performed with reference to a logical cluster address/physical cluster address conversion table that is formed for each segment.--

--21. (New) The method according to claim 19, wherein second sector data is transferred to a second storage and first sector data is written into a first storage immediately after the first sector data is transferred to the first storage.--

--22. (New) The method according to claim 19, wherein a segment address, a storage address, and a sector address are created for recording data into plural of said nonvolatile storages.--

---

**REMARKS**

Favorable reconsideration of the application is respectfully requested in light of the amendments and remarks herein.

Claims 1-6 were pending in this application. By the present Amendment, Claims 1-6 are canceled and Claims 7-22 are added. In addition, the specification is amended to correct an obvious error. Further, a request for approval of drawing changes accompanies this Amendment under separate cover to eliminate unnecessary material written on sheet 15 of the drawings.

Claims 1-6 were rejected under 35 U.S.C. 103(a) over the Estakhri patent in view of the Smith patent. Applicants submit that Claims 7-22 presented herein are patentably distinguishable from any proper combination of Estakhri and Smith.

Contrary to independent Claim 7, for example, it is submitted that the applied portions of Estakhri and Smith do not result in a nonvolatile memory system that includes, *inter alia*, a plurality of storages divided into a plurality of segments, where each segment is distributed and arranged into said plurality of storages, and each said segment includes a group of continuous sectors of the plurality of storages. It is submitted that none of the applied portions of Estakhri and Smith teaches or suggests at least the above-noted features.

Accordingly, it is manifest that any proper combination of Estakhri and Smith would still lack essential elements of Applicants' claimed invention; and thus any such combination cannot render Applicants' claims obvious under §103.

For analogous reasons, Applicants' inventions as set forth in independent Claims 11, 15 and 19 are not rendered obvious by Estakhri and Smith under §103.

The remaining claims in this application are patentable based at least upon their respective dependencies from one of the above-noted independent claims.

### Conclusion

In light of the foregoing, entry of this Amendment, and the allowance of this application with Claims 7-22 are respectfully solicited.

The above statements concerning the disclosures in the cited references represent the present opinion of Applicant's representative and, in the event that the Examiner disagrees,

Applicant's representative respectfully requests the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

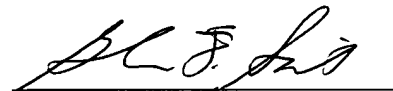
It is submitted that the claims in this application, as originally presented, are patentably distinct over the prior art cited by the examiner, and that these claims were in full compliance with the requirements of 35 U.S.C. 112. Replacement of these claims, as presented herein, is not done for the purpose of patentability within the meaning of 35 U.S.C. §§101, 102, 103 or 112. Rather, these changes are made for clarification and to round out the scope of protection for the invention.

Attached hereto is a marked-up version of the changes made to the specification by the current amendment. The attached page is captioned **"Version With Markings to Show Changes Made."**

In the event that additional cooperation in this case may be helpful to complete its prosecution, the Examiner is cordially invited to contact Applicant's representative at the telephone number written below.

Respectfully submitted,  
FROMMER LAWRENCE & HAUG LLP

By:



Glenn F. Savit  
Reg. No. 37,437  
(212) 588-0800

**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

**IN THE SPECIFICATION:**

The paragraph beginning on line 10 of page 14 has been amended as follows:

• --[Fig. 13 is a] Figs. 13A and 13B are schematic diagrams showing an example of a logical/physical address conversion table of the flash memory to which the present invention can be applied;--.